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*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
** LICENSED TO PRACTICE IN PENNSYLVANIA

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PLEASE REPLY TO
CAMDEN COUNTY OFFICE

July 29, 2013

The Honorable Joel Schneider, Magistrate Judge
United States District Court for the
District of New Jersey/ Camden Vicinage
Mitchell H. Cohen Building & US Courthouse
One John F. Gerry Plaza
Camden, New Jersey 08101

Re: Tracey Miller, Sr. v Waterford Township, Sergeant Joseph McNally,
Officer Timothy Lyons, Evesham Township, and Officer Bernard
Davis

Civil Action Number: 11-cv-3405 (JEI/ JS)
And

Re: S.M. (A Minor) Tracey Miller, Sr. Guardian ad Litem for S.M. v
Waterford Township, Sergeant Joseph McNally, Officer Timothy
Lyons, Evesham Township, and Officer Bernard Davis

Civil Action Number: 11-cv-3579 (JBS/JS)
And

Re: Ronald Miller, Sr. and Lavina Miller v Waterford Township,
Sergeant Joseph McNally, and Officer Timothy Lyons

Civil Action Number: 11-cv-3578 (JBS/ JS)
Our File Number: 47620-124

Dear Judge Schneider:

In accord with Your Honor's Letter Order of June 28, 2013,
dispositive motions are due to be filed with the Court by July 31,
2013. Since Your Honor's ruling, the deposition of Officer Staiger

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July 29, 2013

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Civil Action Number: 11-cv-3405 (JEI/JS)

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Civil Action Number: 11-cv-3579 (JBS/JS)

And

Re: Ronald Miller, Sr. and Lavina Miller v Waterford Township, et al.
Civil Action Number: 11-cv-3578 (JBS/JS)
Our File Number: 47620-124

(scheduled for July 8, 2013) was rescheduled for today, July 29th. (The witness was present and the deposition went forward.)

In light of the adjourned deposition of Officer Staiger, and the timeframe needed for the transcript to be produced, reviewed, and perhaps made a part of the Motion for Summary Judgment, we respectfully request a two week adjournment for filing dispositive motions to August 14, 2013.

We have communicated with our adversary, and Mr. Fiore poses no objection.

Respectfully Submitted:

BARKER, GELFAND & JAMES
A PROFESSIONAL CORPORATION

s/ Todd J. Gelfand

By:

Todd J. Gelfand, Esquire

cc: Charles Fiore, Esquire
Attorney for Plaintiffs

J. Brooks DiDonato, Esquire
Attorney for Evesham Township and Officer Davis

James R. Birchmeier, Esquire
Attorney for Sergeant McNally and Officer Lyons

Township of Waterford:
John Maroccia, Esquire/ Solicitor
Chief of Police John W. Knoll

So Ordered this 30th day
of July, 20 13
Joel Schneider
JOEL SCHNEIDER, USMJ